

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JERRY ADAMSKY, on behalf of her minor child, LESLIE BERRY, on behalf of her minor child, VALERIE BERTHELOT, on behalf of her minor child, DESIREE BLACKBURN, on behalf of her minor child, JENNIFER BOIT, on behalf of her minor child, JULIE BROWN, on behalf of her minor child, SARAH CHARACTER, on behalf of her minor child, LINDSAY COLON, on behalf of her minor child, KRISTI FINLEY, on behalf of her minor child, CHRISTINA GARDNER, on behalf of her minor child, TARA GRAY, on behalf of her minor child, SHANE HOWARD, on behalf of his minor child, JENNIFER LEFLORE, on behalf of her minor child, ANDRA LOGAN, on behalf of her minor child, JENNIFER MAURER, on behalf of her minor child, MONICA MENDEZ, on behalf of her minor child, ERICA MOORE, on behalf of her minor child, BRANDIE MORGAN, on behalf of her minor child, SAYUJ PAUDEL, on behalf of her minor child, TARA PITTMAN, on behalf of her minor child, LYNDI REICHENBACH, on behalf of her minor child, CRYSTAL SEGURA, on behalf of her minor child, TIFFANY SEVCIK, on behalf of her minor child, BREANNA SIMPSON, on behalf of her minor child, GARY STANGO, JR., on behalf of his minor child, NYKITA STEEN, on behalf of her minor child, MEGAN TAYLOR, on behalf of her minor child, MARQUITA TUCKER, on behalf of her minor child, MARK WADE, on behalf of his

Case No.: 2:19-cv-01214-JCC

**STIPULATED MOTION TO STAY  
DEFENDANTS' RESPONSE TO  
PLAINTIFFS' COMPLAINT AND  
[PROPOSED] ORDER**

**NOTE ON MOTION CALENDAR:**  
**September 26, 2019**

1 minor child, ALLISON WINSKE, on behalf  
 2 of her minor child, JESSICA XAGORARIS,  
 3 on behalf of her minor child, PATRICK  
 4 YOCKEY, on behalf of his minor child, and  
 5 ROBERT YOUNG, on behalf of his minor  
 6 child, individually and on behalf of all others  
 7 similarly situated,

8 Plaintiffs,

9 v.

10 AMAZON.COM, INC., a Delaware  
 11 corporation, and A2Z DEVELOPMENT  
 12 CENTER, INC., a Delaware corporation,

13 Defendants.

# STIPULATION

14 Plaintiffs Jerry Adamsky, Leslie Berry, Valerie Berthelot, Desiree Blackburn, Jennifer  
 15 Boit, Julie Brown, Sarah Character, Lindsay Colon, Kristi Finley, Christina Gardner, Tara Gray,  
 16 Shane Howard, Jennifer Leflore, Andra Logan, Jennifer Maurer, Monica Mendez, Erica Moore,  
 17 Brandie Morgan, Sayuj Paudel, Tara Pittman, Lyndi Reichenbach, Crystal Segura, Tiffany  
 18 Sevcik, Breanna Simpson, Gary Stango, Jr., Nykita Steen, Megan Taylor, Marquita Tucker,  
 19 Mark Wade, Allison Winske, Jessica Xagoraris, Patrick Yockey, and Robert Young, on behalf of  
 20 their minor children, individually and on behalf of all others similarly situated (“Plaintiffs”), and  
 21 Defendants Amazon.com, Inc. and a2z Development Center, Inc. (collectively, “Defendants”) jointly move to stay the date by which Defendants must respond to Plaintiffs’ complaint (Dkt. No. 1). In support of this request, the Parties state as follows:

22 1. On August 2, 2019, Plaintiffs filed a class action complaint against Defendants.  
 23 Dkt. No. 1. On August 21, 2019, the Parties filed a stipulated motion for extension of time to  
 24 respond to the complaint until October 7, 2019. Dkt. No. 23. On August 27, 2019, the Court  
 25 granted the stipulated motion for an extension of time to respond to the complaint until October  
 26 7, 2019. Dkt. No. 30.

27 2. The Parties have agreed to stay the responsive pleading date, including a potential  
 28 motion to compel arbitration, until 30 days after a determination on the motion to compel

arbitration in the related case, *B.F. and A.A., minors, by and through their guardian Joey Fields, et al. v. Amazon.com, Inc., et al.*, United States District Court for the Western District of Washington, Case No. 2:19-cv-910-RAJ-MLP. The parties further agree to continue the deadline to exchange initial disclosures until 14 days after Defendants file their responsive pleading in this action.

3. The Parties further agree, subject to the Court's approval, to postpone the status conference scheduled for November 12, 2019, Dkt. 10, until a date to be determined by the Court after Defendants' deadline to file their response to Plaintiffs' Complaint.

4. Pursuant to LR 23, the Parties further agree, subject to the Court's approval, good cause exists to extend the time in which Plaintiffs shall move for a determination under Fed. R. Civ. P. 23(c)(1) to a date to be determined by the Court in a future scheduling order.

NOW, THEREFORE, the Parties stipulate and request the Court to stay Defendants' deadline to file a response to Plaintiffs' complaint, including a potential motion to compel arbitration, until 30 days after a determination of the motion to compel arbitration in *B.F. and A.A., minors, by and through their guardian Joey Fields, et al. v. Amazon.com, Inc., et al.*, United States District Court for the Western District of Washington, Case No. 2:19-cv-910-RAJ-MLP. The deadline for the parties to exchange initial disclosures shall be continued to 14 days after Amazon files its responsive pleading in this action.

Dated this 26th day of September, 2019.

Respectfully submitted,

By: s/ Jeffrey A. Ware

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*Attorneys for Plaintiffs and the Proposed  
Classes*

**[PROPOSED] ORDER**

Pursuant to the Parties' stipulated request for such relief, the deadline for Defendants to respond to Plaintiffs' complaint is stayed until 30 days after a determination of the motion to compel arbitration pending in *B.F. and A.A., minors, by and through their guardian Joey Fields, et al. v. Amazon.com, Inc., et al.*, United States District Court for the Western District of Washington, Case No. 2:19-cv-910-RAJ-MLP. The deadline for the parties to exchange initial disclosures is continued to 14 days after Defendants file their responsive pleading in this action. The status conference scheduled for November 12, 2019, Dkt. 10, is postponed until a date after Defendants' deadline to file their response to Plaintiffs' Complaint to be determined by the Court. Pursuant to LR 23, good cause exists to extend the time in which Plaintiffs shall move for a determination under Fed. R. Civ. P. 23(c)(1) to a date to be determined by the Court in a future scheduling order.

IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
THE HONORABLE JOHN C. COUGHENOUR

Presented by:

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A2Z DEVELOPMENT CENTER, INC.

**CERTIFICATE OF SERVICE**

I, Jeffrey A. Ware, hereby certify that on September 26, 2019, I caused the foregoing  
**STIPULATED MOTION TO STAY DEFENDANTS' RESPONSE TO PLAINTIFFS'**  
**COMPLAINT AND [PROPOSED] ORDER** to be served on the following parties as indicated  
 below:

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Dated: September 26, 2019

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